

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ABRAHAM ATACHBARIAN ROTH IRA,	)	
On Behalf of Itself and All Others Similarly	)	
Situated,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:16cv - 01302 LPS
v.	)	
	)	
	)	
SYNUTRA INTERNATIONAL, INC.,	)	
LIANG ZHANG, YALIN WU, LEI LIN,	)	
JINRONG CHEN, DONGHAO YANG,	)	
DAVID HUI LI, and BEAMS POWER	)	
MERGER SUB LIMITED,	)	
	)	
	)	
Defendants.	)	

**STIPULATION AND PROPOSED ORDER CLOSING THE  
ACTION FOR ALL PURPOSES**

WHEREAS, on March 16, 2017, the parties filed a Stipulation and Proposed Order Dismissing the Action and Retaining Jurisdiction to Determine Plaintiff's Application for an Award of Attorneys' Fees and Reimbursement of Expense ("Stipulation of Dismissal");

WHEREAS, the Stipulation of Dismissal provided that the above-captioned Action be dismissed in its entirety, with prejudice with respect to the named plaintiff ("Plaintiff"), and without prejudice as to all other putative class members;

WHEREAS, the Stipulation further provided that the Court retain jurisdiction over the Action solely for the purposed of adjudicating Plaintiff's potential Application for Attorneys' Fees and Reimbursement of Expense Application (the "Application");

WHEREAS, the Court approved the Stipulation and entered the Proposed Order dismissing the Action but retaining jurisdiction for purposes of hearing the Application, on March 20, 2017; and

WHEREAS, the parties have reached an agreement with respect to the matter of fees and expenses without the need for further litigation, which fees and expenses shall be paid within fourteen (14) days of entry of an order closing the Action;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants, by and through their undersigned counsel, subject to the approval of the Court, that the Action is closed for all purposes.

Dated: May 11, 2017

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BIGGS AND BATTAGLIA

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SO ORDERED this       day of       , 2017.

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The Honorable Leonard P. Stark